

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-327-C**

IN RE:

Continued Availability of Unbundled High)
Capacity Loops at Certain Locations and)
Unbundled High Capacity Transport on Certain)
Routes Pursuant to the Federal Communication)
Commission's Triennial Review Order)
_____)

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
RESPONSE TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES [Nos. 1-27]**

AT&T Communications of the Southern States, LLC, pursuant to Rules 26 and 33 of the South Carolina Rules of Civil Procedure, and Rules 103-853 and 103-854 of the Rules and Regulations of the Public Service Commission of South Carolina (hereinafter "Commission"), object generally to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories, served on December 9, 2003, as described below.

PUBLIC REDACTED VERSION

REQUEST: BellSouth First Set of Interrogatories

DATED: December 8, 2003

Interrogatory 1: Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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Interrogatory 2: Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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Interrogatory 3: Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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Interrogatory 4: For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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DATED: December 8, 2003

Interrogatory 5: For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are willing and able immediately to provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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Interrogatory 6: For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet¹ related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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Interrogatory 7: If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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Interrogatory 8: Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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DATED: December 8, 2003

Interrogatory 9: Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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DATED: December 8, 2003

Interrogatory 10: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 8 above should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: December 8, 2003

Interrogatory 11: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 9 above should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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DATED: December 8, 2003

Interrogatory 12: For each state in Question 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets) identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
- f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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Interrogatory 13: For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets), identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.
- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

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Interrogatory 14: Provide a list of all BellSouth wire centers in the Southeastern states to which you are currently in the process of deploying, or plan to deploy transport facilities and/or loop facilities. List wire centers if this deployment is in process or will take place from the time period beginning October 1, 2003 through December 31, 2004.

Objection: In the Triennial Review Order, the FCC establishes the factors that a state Commission should consider in any analysis of a Loop and Transport potential deployment case.

“[T]he state commission must consider various factors affecting the ability to economically deploy These factors include: evidence of alternative loop deployment at that location; local engineering costs of building and utilizing transmission facilities; the cost of underground or aerial laying of fiber or copper; the cost of equipment needed for transmission; installation and other necessary costs involved in setting up service; local topography such as hills and rivers; availability of reasonable access to rights-of-way; building access restrictions/costs; availability/feasibility of similar quality/reliability alternative transmission technologies at that particular location.” (TRO, Paragraphs 335 and 410)

Given this directive from the FCC, information concerning the wire centers in the Southeastern states in which AT&T is “currently in the process of deploying or plans to deploy transport facilities and/or loop facilities beginning October 1, 2003 through December 31, 2004” is neither relevant to a potential deployment analysis nor likely to lead to the discovery of admissible evidence. By way of further response, this Interrogatory is asking for AT&T's future capital planning forecast, the particulars of which, as BellSouth is well aware from its own planning and forecasting processes, likely will change quarter over quarter as circumstances change. In any event, AT&T's future capital planning forecast is not relevant and to the extent AT&T implements any such plan, the results (but not any plans) might be relevant in any future “actual deployment” case that BellSouth is permitted to request under the TRO. AT&T does not intend to provide this information to BellSouth absent a Motion to Compel and Order of a Commission requiring AT&T to do so.

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DATED: December 8, 2003

Interrogatory 15: List all BellSouth wire centers in the Southeastern states where you have collocation, either virtual or physical. In Microsoft Excel format, list the 11-character wire center CLLI code and the CLLI code designating each arrangement you have within that wire center. For each wire center listed identify:

- a. The type of collocation (caged, cageless, shared, virtual, other (with a description)) and identify the total amount of space currently occupied and reserved for future growth;
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).
- d. The amount of unused or excess space in each collocation space.
- e. The number of active and inactive DS1 cross connects
- f. The number of active and inactive DS3 Cross-connects
- g. The number of active and inactive 2-fiber cross-connects
- h. The number of active and inactive 4-fiber cross-connects.
- i. State whether you have deployed fiber "entrance" facilities that you own which connect to the collocation arrangements identified.
- j. State whether you have fiber "entrance" facilities that you have obtained from a person other than BellSouth which connect to the collocation arrangements identified.
- k. State whether you have fiber cross-connects which connect the identified arrangement(s) to other persons collocated at the same wire center. If yes, (i) identify all carriers to which your arrangements are connected within the wire center; and (ii) identify the capacity or type of connection.

Response: In response to subparts a, b, and c: - See Confidential Attachments 15 and 15a.

As to subparts: d., e., f., e., g., h., i., j., k.. AT&T objects to these Interrogatories on the grounds that the information requested is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, subparts i and j request information on "entrance facilities" which are not included within the definition of "transport" as defined by the TRO at ¶ 366 and fn. 1116.

Subject to the foregoing, and without any objections, AT&T provides the following answer for subpart k. – AT&T has no such arrangements.

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Interrogatory 16: Provide a list of all BellSouth wire centers and/or central offices in the Southeastern states to which you have deployed high capacity transport facilities that are operationally ready to provide dedicated transport along a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. This interrogatory varies from Interrogatory No. 1 in this docket as it seeks wire centers/central offices even if you are not actually providing transport from the locations; it also seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the IXC transport route should be identified:

BST wire center→IXC POP←→IXC POP→BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- d. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- e. The total active capacity and number of fiber strands deployed as of the most recent date available;
- f. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- g. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- h. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.

- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement
- d. The total active capacity and number of fiber strands deployed as of the most recent date available;
- e. The type of facility (e.g., fiber, coaxial cable, etc.).

Response: See AT&T's Response to Interrogatory No. 1, *supra*.

AT&T is not a self-provider of transport as defined by the TRO and therefore has no input to provide.

AT&T self-provides facilities that connect, for example, our switch to ILEC office A and facilities that connect our switch to ILEC office B using portions of a fiber that passes near/through both A and B, but does not either (1) connect A to B or (2) take on a dedicated basis any "traffic" that originates at either one to the other and therefore AT&T's facilities are not dedicated transport as defined by the TRO and new FCC rule.

See also, AT&T's Response to Interrogatory No. 2, *supra*.
AT&T is not a provider of wholesale transport as defined by the TRO and therefore has no input to provide.

REQUEST: BellSouth First Set of Interrogatories

DATED: December 8, 2003

Interrogatory 17: For each central office/wire center identified in response to Interrogatory No. 16:

- a. Are your transport facilities operationally ready to provide dedicated transport between the central office/wire center identified and any other ILEC wire center on the same list?
- b. If your response to part (a) above is negative, identify each such the ILEC central offices on the list that does not satisfy part (a) and explain with particularity why not.

Response: See response to Interrogatory No. 16, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: December 8, 2003

Interrogatory 18: Provide a list of all BellSouth wire centers and/or central offices in the Southeastern states from which you offer to other carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that provide a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. This interrogatory varies from Interrogatory No.2 in this docket as it seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the transport route between IXC – points of presence (“POP”) should be identified:
BST wire center→IXC POP←→IXC POP→BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- f. The type of collocation at which the facilities terminate;
- g. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- h. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- i. The total active capacity and number of fiber strands deployed as of the most recent date available;
- j. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- k. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- l. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

Response: AT&T incorporates by reference its' response to Interrogatory No. 2, *supra*. Specifically, AT&T is not a provider of wholesale transport as defined by the TRO and therefore has no input to provide.

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DATED: December 8, 2003

Interrogatory 19: For each central office/wire center identified in response to Interrogatory No. 18:

- a. Are you willing and able immediately to provide high capacity transport, on a wholesale basis, over transport facilities between the wire central office/wire center identified and any other ILEC wire center on the same list?
- b. If your responses to part (a) above is negative, identify each such the ILEC central office/wire center on the list that does not satisfy part (a) and explain with particularity why not.

Response: See Response to Interrogatory No. 18, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: December 8, 2003

Interrogatory 20: Identify the points within all Southeastern states at which you connect your local network facilities to the networks of other carriers, including but not limited to interconnection with other CLECs, interexchange carriers, internet service providers at any point of presence ("POP"), network access point ("NAP"), collocation hotels, data centers, or similar facility. This interrogatory may be answered with network diagrams.

Response: AT&T objects to providing the points (or network diagrams showing the points) at which its network connects to the network of other CLECs, Interexchange Carriers, or ISPs due to the fact that such information is not relevant and not likely to lead to the discovery of admissible evidence in any potential deployment case. The TRO, at paragraphs 335 and 410 discuss the factors to be considered by a state Commission in a potential deployment case. The points at which the AT&T network connects to the networks of carriers and firms other than BellSouth has no relevance to whether AT&T could potentially deploy a high capacity loop from its network to a specific customer location or provide high capacity transport between BellSouth wire centers. AT&T does not intend to provide this information to BellSouth absent a Motion to Compel and Order of a Commission requiring AT&T to do so.

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DATED: December 8, 2003

Interrogatory 21: Identify the points within all Southeastern states at which you connect your local network facilities to BellSouth's network, including but not limited to any and all points of presence ("POP"). This interrogatory may be answered with network diagrams.

Response: AT&T objects to this Interrogatory on the grounds that the information sought is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Specifically, this Interrogatory seeks information beyond the scope of the definition of dedicated transport in the TRO that includes only transport between pairs of ILEC wire centers.

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DATED: December 8, 2003

Interrogatory 22: On an MSA-specific basis, in the southern states please describe with specificity the configuration of your transport and/or loop facilities; including, but not limited to: (a) the configuration of your facilities (e.g., point to point or ring configuration); (b) the customer specific locations that are accessible from your facilities; and (c) a list of all customer units accessible in a multi-tenant building.

Response:

- a. AT&T builds its self-provided facilities in a ring configuration.
- b. See Confidential Attachment 12.
- c. See Confidential Attachment 12. AT&T asserts that it has access to all customer units accessible in the multi-tenant buildings listed in Attachment 12. AT&T objects to providing information on specific customer units accessible in the multi-unit buildings, and will not do so until or unless a Commission Orders such a response.

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Interrogatory 23: Provide a list of all fiber rings in the Southeastern states you own or control and identify the location (by street address) of each add-drop multiplexer or comparable facility for connection other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.

Response: AT&T objects to providing a list of all fiber rings in the Southeastern states AT&T owns or controls or to identify the location (by street address) of each add-drop multiplexer or comparable facility for connection other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring due to the fact that it is not relevant and not likely to lead to the discovery of admissible evidence in any potential deployment case. The TRO, at paragraphs 335 and 410 discuss the factors to be considered by a state Commission in a potential deployment case. The location of AT&T's add-drop multiplexers and fiber rings has no relevance to whether AT&T could potential deploy a high capacity loop from its network to a specific customer location or provide high capacity transport. AT&T does not intend to provide this information to BellSouth absent a Motion to Compel and Order of a Commission requiring AT&T to do so.

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Interrogatory 24: Identify each shared or non-BellSouth location (e.g., collocation hotel) in the Southeastern states in which you are located. For each such location state:

- a. The type of collocation or sharing/leasing of space for placement of equipment (e.g., caged, cageless, shared, or virtual);
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).

Response: AT&T objects to this Interrogatory on the grounds that the information sought is not relevant nor is it reasonably calculated to lead to the discovery of admissible evidence. Specifically this Interrogatory purports to seek information which is clearly beyond the scope of the definition of dedicated transport as defined in the Triennial Review Order and includes only transport between pairs of ILEC wire centers.

Subject to the foregoing, see AT&T's Response to Interrogatory Nos. 1 and 5 to BellSouth's First Set of Interrogatories to AT&T, Florida Docket 030851-TP. Other than the switch locations identified in the said responses, AT&T is not located in any non-Bell (ILEC) locations.

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Interrogatory 25: For each arrangement identified in response to Interrogatory 23 and in response to Interrogatory 16, please list the types of services that are provided utilizing such an arrangement.

- a. List all types of services you offer to your end users from each collocation space describe or demand and the quantity of each service you provide and/or offer.
- b. For each service identified in (a), list the average monthly revenue associated with each type of service.

Response: See response to Interrogatory No. 23, *supra*.

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DATED: December 8, 2003

Interrogatory 26: Provide a list of all customer locations in each/any of the Southeastern states at which you have deployed high capacity loop facilities (DS3 or greater facilities, including dark fiber) that you own and where you are serving customers using those facilities. *This interrogatory varies from Interrogatory No. 8 in this docket as it is not limited to loop facilities solely used to provide retail service.* For each customer location, identify:

- a. The RSAG valid address of the customer location;
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc. from which the loop is extended to the customer location (by 11 character CLLI);
- c. Whether you have the unrestricted ability to serve all customers at that location, if the location is a multi-tenant location. If not, explain with particularity why not, including any restrictions on your ability to serve customers and the steps you have taken to address such restrictions.
- d. The total active capacity and the number of fiber strands on your facilities at the specific customer locations using the most recent data available;
- e. Whether your facilities are operationally ready to provide DS3 loops at the specific customer location.

Response: AT&T's services provided to customers are all "retail" services. AT&T does not provide "wholesale" services to customers, and is not a wholesale provider of loops to carriers. See AT&T's response to Interrogatory No. 12 for the information requested about the customer location we serve with self-provided loops.

REQUEST: BellSouth First Set of Interrogatories

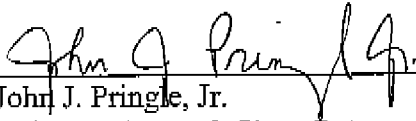
DATED: December 8, 2003

Interrogatory 27: Describe with particularity all factors you consider when deciding whether to extend high capacity loop or transport facilities to:

- a. pick up additional traffic;
- b. pick up additional or new customers;
- c. pick up additional or new buildings.

Response: The fiber extensions that leave the AT&T local network and deliver service to a specific building or location - is determined on an individual case basis, and must be justified based on committed traffic, actual distance from existing facilities, costs, other limitations of construction, including Rights of Ways and building entry conditions, and time to construct the facilities.

Respectfully submitted, this the 8th day of January, 2004.




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Attorney for AT&T Communications of the Southern States, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct public redacted copy of the foregoing AT&T Responses to BellSouth's First Set of Interrogatories and Request for Production of Documents was posted to the public website, <http://www.compsouth.net>, and that notice of this posting was sent by electronic mail to all parties of record this 8th day of January, 2004. Additionally, a copy of the confidential version of the foregoing was sent by U.S. mail, first class postage prepaid, to all parties who signed the Protective Agreement.


Margaret A. Plasman

AT&T's Responses to BellSouth's First Set of Interrogatories (1-27)
Docket No. 2003-327-C
January 8, 2004

AT&T RESPONSES TO BELL SOUTH'S FIRST SET OF INTERROGATORIES (1-13) FILED
IN FLORIDA DOCKET 030852-TP

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| | | |
|--|---|-------------------------|
| In re: Implementation of requirements arising |) | |
| from Federal Communications Commission's |) | Docket No. 030852-TP |
| triennial UNE review: Location-Specific Review |) | |
| for DS1, DS3 and Dark Fiber Loops, and Route- |) | Filed: November 6, 2003 |
| Specific Review for DS1, DS3 and Dark Fiber |) | |
| Transport. |) | |

**AT&T'S RESPONSES TO BELL SOUTH'S
FIRST SET OF INTERROGATORIES (NOS. 1-13)**

Subject to the General Objections filed with the Florida Public Service Commission on or about October 23, 2003, AT&T Communications of the Southern States, LLC and TCG South Florida (hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003 (hereinafter "*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, submits the following responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to AT&T Communications of the Southern States, LLC, served on October 15, 2003, as follows:

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 1: Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

| Response to Question 1 | | | | | | | | | |
|------------------------|----|----|----|----|----|----|----|----|----|
| | AL | FL | GA | KY | LA | MS | NC | SC | TN |
| Affirm | | | | | | | | | |
| Deny | X | X | X | X | X | X | X | X | X |

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 2: Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

| Response to Question 2 | | | | | | | | | |
|------------------------|----|----|----|----|----|----|----|----|----|
| | AL | FL | GA | KY | LA | MS | NC | SC | TN |
| Affirm | | | | | | | | | |
| Deny | X | X | X | X | X | X | X | X | X |

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 3: Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

| Response to Question 3 | | | | | | | | | |
|------------------------|----|----|----|----|----|----|----|----|----|
| | AL | FL | GA | KY | LA | MS | NC | SC | TN |
| Affirm | | | | | | | | | |
| Deny | X | X | X | X | X | X | X | X | X |

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 4: For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

See Response to Interrogatory No. 1. AT&T has no input to provide.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 5: For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are willing and able immediately to provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

See Response to Interrogatory No. 2. AT&T has no input to provide.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 6: For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet¹ related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

See Response to Interrogatory No. 3. AT&T has no input to provide.

¹ Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 7: If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

Response: Not applicable. AT&T has no input to provide.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 8: Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

| Response - Question 8: Self-provided facilities for providing retail service | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|
| | AL | FL | GA | KY | LA | MS | NC | SC | TN |
| Affirm | X | X | X | X | | X | X | X | X |
| Deny | | | | | X | | | | |

REQUEST: Bellsouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 9: Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

| Response - Question 9: Self-provided facilities offered on wholesale basis | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|
| | AL | FL | GA | KY | LA | MS | NC | SC | TN |
| Affirm | | | | | | | | | |
| Deny | X | X | X | X | X | X | X | X | X |

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 10: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 8 above should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

| Response -Question 10: 3 rd Party facilities leased for providing retail service | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|
| | AL | FL | GA | KY | LA | MS | NC | SC | TN |
| Affirm | | | | | | | | | |
| Deny | X | X | X | X | X | X | X | X | X |

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 11: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 9 above should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

| Response -Question 11: 3 rd Party facilities leased for reselling as wholesale service | | | | | | | | | |
|---|----|----|----|----|----|----|----|----|----|
| | AL | FL | GA | KY | LA | MS | NC | SC | TN |
| Affirm | | | | | | | | | |
| Deny | X | X | X | X | X | X | X | X | X |

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 12: For each state in Question 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets)² identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
- f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

² Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

See Confidential Attachment 12 for data related to each of the 8 states affirmed in AT&T's Response to Interrogatory No. 8.

AT&T provides a minimum of 1 DS3 to each of the locations identified. Specific capacity at each location is not provided, but whether or not additional service can be provided to a location is indicated.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 13: For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets),³ identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.
- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

See Responses to Interrogatory Nos. 9 and 11. AT&T has no input to provide.

³ Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

SUBMITTED this 6th day of November, 2003.



TRACY W. HATCH, ESQ.

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Suite 700

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(850) 425-6360

Attorney for AT&T Communications of
the Southern States, LLC

ATTACHMENT 12

REDACTED

| AT&T Confidential and Proprietary Information | | | | | | | | | |
|---|---------|------|-------|----------|--|------------------------|-----------------------|-------------------------|---------------------------|
| Building CLLI | Address | City | State | Zip Code | Additional Capacity Available to Provision | Reporting Company Name | Facility wholly owned | Dark fiber IRU from BST | Can serve all at location |
| 1 | | | | | | AT&T | Yes | No | Yes |
| 2 | | | | | | AT&T | Yes | No | Yes |
| 1 | | | | | | AT&T | Yes | No | Yes |
| 2 | | | | | | AT&T | Yes | No | Yes |
| 3 | | | | | | AT&T | Yes | No | Yes |
| 4 | | | | | | AT&T | Yes | No | Yes |
| 5 | | | | | | AT&T | Yes | No | Yes |
| 6 | | | | | | AT&T | Yes | No | Yes |
| 7 | | | | | | AT&T | Yes | No | Yes |
| 8 | | | | | | AT&T | Yes | No | Yes |
| 9 | | | | | | AT&T | Yes | No | Yes |
| 10 | | | | | | AT&T | Yes | No | Yes |
| 11 | | | | | | AT&T | Yes | No | Yes |
| 12 | | | | | | AT&T | Yes | No | Yes |
| 13 | | | | | | AT&T | Yes | No | Yes |
| 14 | | | | | | AT&T | Yes | No | Yes |
| 15 | | | | | | AT&T | Yes | No | Yes |
| 16 | | | | | | AT&T | Yes | No | Yes |
| 17 | | | | | | AT&T | Yes | No | Yes |
| 18 | | | | | | AT&T | Yes | No | Yes |
| 19 | | | | | | AT&T | Yes | No | Yes |
| 20 | | | | | | AT&T | Yes | No | Yes |
| 21 | | | | | | AT&T | Yes | No | Yes |
| 22 | | | | | | AT&T | Yes | No | Yes |
| 23 | | | | | | AT&T | Yes | No | Yes |
| 24 | | | | | | AT&T | Yes | No | Yes |
| 25 | | | | | | AT&T | Yes | No | Yes |
| 26 | | | | | | AT&T | Yes | No | Yes |
| 27 | | | | | | AT&T | Yes | No | Yes |
| 28 | | | | | | AT&T | Yes | No | Yes |
| 29 | | | | | | AT&T | Yes | No | Yes |
| 30 | | | | | | AT&T | Yes | No | Yes |
| 31 | | | | | | AT&T | Yes | No | Yes |
| 32 | | | | | | AT&T | Yes | No | Yes |
| 33 | | | | | | AT&T | Yes | No | Yes |
| 34 | | | | | | AT&T | Yes | No | Yes |
| 35 | | | | | | AT&T | Yes | No | Yes |
| 36 | | | | | | AT&T | Yes | No | Yes |
| 37 | AT&T | Yes | No | Yes | | | | | |
| 38 | AT&T | Yes | No | Yes | | | | | |

| | | | | |
|----|------|-----|----|-----|
| 39 | AT&T | Yes | No | Yes |
| 40 | AT&T | Yes | No | Yes |
| 41 | AT&T | Yes | No | Yes |
| 42 | AT&T | Yes | No | Yes |
| 43 | AT&T | Yes | No | Yes |
| 44 | AT&T | Yes | No | Yes |
| 45 | AT&T | Yes | No | Yes |
| 46 | AT&T | Yes | No | Yes |
| 47 | AT&T | Yes | No | Yes |
| 48 | AT&T | Yes | No | Yes |
| 49 | AT&T | Yes | No | Yes |
| 50 | AT&T | Yes | No | Yes |
| 51 | AT&T | Yes | No | Yes |
| 52 | AT&T | Yes | No | Yes |
| 53 | AT&T | Yes | No | Yes |
| 54 | AT&T | Yes | No | Yes |
| 55 | AT&T | Yes | No | Yes |
| 56 | AT&T | Yes | No | Yes |
| 57 | AT&T | Yes | No | Yes |
| 58 | AT&T | Yes | No | Yes |
| 59 | AT&T | Yes | No | Yes |
| 60 | AT&T | Yes | No | Yes |
| 61 | AT&T | Yes | No | Yes |
| 62 | AT&T | Yes | No | Yes |
| 63 | AT&T | Yes | No | Yes |
| 64 | AT&T | Yes | No | Yes |
| 65 | AT&T | Yes | No | Yes |
| 66 | AT&T | Yes | No | Yes |
| 67 | AT&T | Yes | No | Yes |
| 68 | AT&T | Yes | No | Yes |
| 69 | AT&T | Yes | No | Yes |
| 70 | AT&T | Yes | No | Yes |
| 71 | AT&T | Yes | No | Yes |
| 72 | AT&T | Yes | No | Yes |
| 73 | AT&T | Yes | No | Yes |
| 74 | AT&T | Yes | No | Yes |
| 75 | AT&T | Yes | No | Yes |
| 76 | AT&T | Yes | No | Yes |
| 77 | AT&T | Yes | No | Yes |
| 78 | AT&T | Yes | No | Yes |
| 79 | AT&T | Yes | No | Yes |
| 80 | AT&T | Yes | No | Yes |
| 81 | AT&T | Yes | No | Yes |
| 82 | AT&T | Yes | No | Yes |
| 83 | AT&T | Yes | No | Yes |
| 84 | AT&T | Yes | No | Yes |
| 85 | AT&T | Yes | No | Yes |
| 86 | AT&T | Yes | No | Yes |

| | | | | |
|-----|------|-----|----|-----|
| 87 | AT&T | Yes | No | Yes |
| 88 | AT&T | Yes | No | Yes |
| 89 | AT&T | Yes | No | Yes |
| 90 | AT&T | Yes | No | Yes |
| 91 | AT&T | Yes | No | Yes |
| 92 | AT&T | Yes | No | Yes |
| 93 | AT&T | Yes | No | Yes |
| 94 | AT&T | Yes | No | Yes |
| 95 | AT&T | Yes | No | Yes |
| 96 | AT&T | Yes | No | Yes |
| 97 | AT&T | Yes | No | Yes |
| 98 | AT&T | Yes | No | Yes |
| 99 | AT&T | Yes | No | Yes |
| 100 | AT&T | Yes | No | Yes |
| 101 | AT&T | Yes | No | Yes |
| 102 | AT&T | Yes | No | Yes |
| 103 | AT&T | Yes | No | Yes |
| 104 | AT&T | Yes | No | Yes |
| 105 | AT&T | Yes | No | Yes |
| 106 | AT&T | Yes | No | Yes |
| 107 | AT&T | Yes | No | Yes |
| 108 | AT&T | Yes | No | Yes |
| 109 | AT&T | Yes | No | Yes |
| 110 | AT&T | Yes | No | Yes |
| 111 | AT&T | Yes | No | Yes |
| 112 | AT&T | Yes | No | Yes |
| 113 | AT&T | Yes | No | Yes |
| 114 | AT&T | Yes | No | Yes |
| 115 | AT&T | Yes | No | Yes |
| 116 | AT&T | Yes | No | Yes |
| 117 | AT&T | Yes | No | Yes |
| 118 | AT&T | Yes | No | Yes |
| 119 | AT&T | Yes | No | Yes |
| 120 | AT&T | Yes | No | Yes |
| 121 | AT&T | Yes | No | Yes |
| 122 | AT&T | Yes | No | Yes |
| 123 | AT&T | Yes | No | Yes |
| 124 | AT&T | Yes | No | Yes |
| 125 | AT&T | Yes | No | Yes |
| 126 | AT&T | Yes | No | Yes |
| 127 | AT&T | Yes | No | Yes |
| 128 | AT&T | Yes | No | Yes |
| 129 | AT&T | Yes | No | Yes |
| 1 | AT&T | Yes | No | Yes |
| 2 | AT&T | Yes | No | Yes |
| 3 | AT&T | Yes | No | Yes |
| 4 | AT&T | Yes | No | Yes |

| | | | | |
|----|------|-----|----|-----|
| 5 | AT&T | Yes | No | Yes |
| 6 | AT&T | Yes | No | Yes |
| 7 | AT&T | Yes | No | Yes |
| 8 | AT&T | Yes | No | Yes |
| 9 | AT&T | Yes | No | Yes |
| 10 | AT&T | Yes | No | Yes |
| 11 | AT&T | Yes | No | Yes |
| 12 | AT&T | Yes | No | Yes |
| 13 | AT&T | Yes | No | Yes |
| 14 | AT&T | Yes | No | Yes |
| 15 | AT&T | Yes | No | Yes |
| 16 | AT&T | Yes | No | Yes |
| 17 | AT&T | Yes | No | Yes |
| 18 | AT&T | Yes | No | Yes |
| 19 | AT&T | Yes | No | Yes |
| 20 | AT&T | Yes | No | Yes |
| 21 | AT&T | Yes | No | Yes |
| 22 | AT&T | Yes | No | Yes |
| 23 | AT&T | Yes | No | Yes |
| 24 | AT&T | Yes | No | Yes |
| 25 | AT&T | Yes | No | Yes |
| 26 | AT&T | Yes | No | Yes |
| 27 | AT&T | Yes | No | Yes |
| 28 | AT&T | Yes | No | Yes |
| 29 | AT&T | Yes | No | Yes |
| 30 | AT&T | Yes | No | Yes |
| 31 | AT&T | Yes | No | Yes |
| 32 | AT&T | Yes | No | Yes |
| 33 | AT&T | Yes | No | Yes |
| 34 | AT&T | Yes | No | Yes |
| 35 | AT&T | Yes | No | Yes |
| 36 | AT&T | Yes | No | Yes |
| 37 | AT&T | Yes | No | Yes |
| 38 | AT&T | Yes | No | Yes |
| 39 | AT&T | Yes | No | Yes |
| 40 | AT&T | Yes | No | Yes |
| 41 | AT&T | Yes | No | Yes |
| 42 | AT&T | Yes | No | Yes |
| 43 | AT&T | Yes | No | Yes |
| 44 | AT&T | Yes | No | Yes |
| 45 | AT&T | Yes | No | Yes |
| 46 | AT&T | Yes | No | Yes |
| 47 | AT&T | Yes | No | Yes |
| 48 | AT&T | Yes | No | Yes |
| 49 | AT&T | Yes | No | Yes |
| 50 | AT&T | Yes | No | Yes |
| 51 | AT&T | Yes | No | PR |
| 52 | AT&T | Yes | No | Yes |

| | | | | |
|----|------|-----|----|-----|
| 53 | AT&T | Yes | No | Yes |
| 54 | AT&T | Yes | No | Yes |
| 55 | AT&T | Yes | No | Yes |
| 56 | AT&T | Yes | No | Yes |
| 57 | AT&T | Yes | No | Yes |
| 58 | AT&T | Yes | No | Yes |
| 59 | AT&T | Yes | No | Yes |
| 60 | AT&T | Yes | No | Yes |
| 61 | AT&T | Yes | No | Yes |
| 62 | AT&T | Yes | No | Yes |
| 63 | AT&T | Yes | No | Yes |
| 64 | AT&T | Yes | No | Yes |
| 65 | AT&T | Yes | No | Yes |
| 66 | AT&T | Yes | No | Yes |
| 67 | AT&T | Yes | No | Yes |
| 68 | AT&T | Yes | No | Yes |
| 69 | AT&T | Yes | No | Yes |
| 70 | AT&T | Yes | No | Yes |
| 71 | AT&T | Yes | No | Yes |
| 72 | AT&T | Yes | No | Yes |
| 73 | AT&T | Yes | No | Yes |
| 1 | AT&T | Yes | No | Yes |
| 2 | AT&T | Yes | No | Yes |
| 3 | AT&T | Yes | No | Yes |
| 4 | AT&T | Yes | No | Yes |
| 5 | AT&T | Yes | No | Yes |
| 6 | AT&T | Yes | No | Yes |
| 1 | AT&T | Yes | No | Yes |
| 1 | AT&T | Yes | No | Yes |
| 2 | AT&T | Yes | No | Yes |
| 3 | AT&T | Yes | No | Yes |
| 4 | AT&T | Yes | No | Yes |
| 5 | AT&T | Yes | No | Yes |
| 6 | AT&T | Yes | No | Yes |
| 7 | AT&T | Yes | No | Yes |
| 8 | AT&T | Yes | No | Yes |
| 9 | AT&T | Yes | No | Yes |
| 10 | AT&T | Yes | No | Yes |
| 11 | AT&T | Yes | No | Yes |
| 12 | AT&T | Yes | No | Yes |
| 13 | AT&T | Yes | No | Yes |
| 14 | AT&T | Yes | No | Yes |
| 15 | AT&T | Yes | No | Yes |
| 16 | AT&T | Yes | No | Yes |
| 17 | AT&T | Yes | No | Yes |

| | | | | | | | | | |
|----|--|--|--|--|--|------|-----|----|-----|
| 18 | | | | | | AT&T | Yes | No | Yes |
| 19 | | | | | | AT&T | Yes | No | Yes |
| 20 | | | | | | AT&T | Yes | No | Yes |
| 21 | | | | | | AT&T | Yes | No | Yes |
| 1 | | | | | | AT&T | Yes | No | Yes |
| 1 | | | | | | AT&T | Yes | No | Yes |
| 2 | | | | | | AT&T | Yes | No | Yes |
| 3 | | | | | | AT&T | Yes | No | Yes |
| 4 | | | | | | AT&T | Yes | No | Yes |
| 5 | | | | | | AT&T | Yes | No | Yes |
| 6 | | | | | | AT&T | Yes | No | Yes |
| 7 | | | | | | AT&T | Yes | No | Yes |
| 8 | | | | | | AT&T | Yes | No | Yes |
| 9 | | | | | | AT&T | Yes | No | Yes |
| 10 | | | | | | AT&T | Yes | No | Yes |
| 11 | | | | | | AT&T | Yes | No | Yes |
| 12 | | | | | | AT&T | Yes | No | Yes |
| 13 | | | | | | AT&T | Yes | No | Yes |
| 14 | | | | | | AT&T | Yes | No | Yes |
| 15 | | | | | | AT&T | Yes | No | Yes |
| 16 | | | | | | AT&T | Yes | No | Yes |
| 17 | | | | | | AT&T | Yes | No | Yes |
| 18 | | | | | | AT&T | Yes | No | Yes |
| 19 | | | | | | AT&T | Yes | No | Yes |
| 20 | | | | | | AT&T | Yes | No | Yes |
| 21 | | | | | | AT&T | Yes | No | Yes |
| 22 | | | | | | AT&T | Yes | No | Yes |

ATTACHMENT 15

REDACTED

| | | | | STATE | V-COORD | H-COORD | Central Office Name | LATA | National Planning Type | Stakeholder | Active DLC | Active OC 48 | Collocation Type | Ratecenter | ZIP | MSA | Service Status |
|----|--|--|--|-------|---------|---------|----------------------|----------------|------------------------|-------------|------------|--------------|------------------|------------|---------|---------------------------------|----------------|
| AL | | | | AL | 752200 | 242700 | BIRMINGHAM-CAHABA HE | 476 NFB | LNS | LNS | TRUE | FALSE | Physical | BIRMINGHAM | 35243 | Birmingham | active |
| AL | | | | AL | 751800 | 244600 | MAIN & TOLL | 476 FB | LNS | LNS | FALSE | TRUE | Virtual | BIRMINGHAM | 35203 | Birmingham | active |
| AL | | | | AL | 751800 | 244600 | MAIN & TOLL | 476 FB | LNS | LNS | TRUE | TRUE | Physical | BIRMINGHAM | 35203 | Birmingham | Active |
| AL | | | | AL | 753400 | 244400 | OXMOOR | 476 NFB | LNS | LNS | TRUE | FALSE | Physical | BIRMINGHAM | 35209 | Birmingham | Active |
| AL | | | | AL | 754500 | 242900 | RIVERCHASE | 476 NFB | LNS | LNS | TRUE | FALSE | Physical | BIRMINGHAM | 35244 | Birmingham | Active |
| AL | | | | AL | 816700 | 236700 | MOBILE-AZALEA | 480 Rifle Shot | LD | LD | FALSE | TRUE | Virtual | MOBILE | 36603 | Mobile | active |
| AL | | | | AL | 769200 | 224700 | | Rifle Shot | | | FALSE | TRUE | | MONTGOMERY | 36104 | Montgomery | Active |
| FL | | | | FL | 792900 | 104300 | ALTAMONTE SPRINGS XA | 458 FB | LNS | LNS | TRUE | TRUE | Physical | WINTERPARK | 32701 | Orlando | Active |
| FL | | | | FL | 822500 | 58200 | BOCA TEECA | 460 FB | LNS | LNS | TRUE | TRUE | Virtual | BOCA RATON | 33487 | West Palm Beach-Boca Raton | Active |
| FL | | | | FL | 822500 | 58200 | BOCA TEECA | 460 FB | LNS | LNS | FALSE | TRUE | Physical | BOCA RATON | 33487 | West Palm Beach-Boca Raton | |
| FL | | | | FL | 822500 | 58200 | BOCA TEECA | 460 NFB | NorthPoint | NorthPoint | FALSE | FALSE | Physical | BOCA RATON | 33487 | West Palm Beach-Boca Raton | Active |
| FL | | | | FL | 823400 | 57300 | RATON MAIN | 460 FB | LNS | LNS | TRUE | TRUE | Physical | BOCA RATON | 33432 | West Palm Beach-Boca Raton | Active |
| FL | | | | FL | 823400 | 57300 | RATON MAIN | 460 NFB | NorthPoint | NorthPoint | FALSE | FALSE | Physical | BOCA RATON | 33432 | West Palm Beach-Boca Raton | Active |
| FL | | | | FL | 818000 | 115700 | Beach Park | 952 FB | LNS | LNS | TRUE | TRUE | Physical | TAMPA | 33603 | Tampa-St. Petersburg-Clearwater | Active |
| FL | | | | FL | 820200 | 120300 | Clearwater | 952 FB | LNS | LNS | TRUE | TRUE | Physical | CLEARWATER | 33756 | Tampa-St. Petersburg-Clearwater | |
| FL | | | | FL | 824200 | 57200 | DEERFIELD BEACH MAIN | 460 NFB | LNS | LNS | TRUE | FALSE | Physical | DEERFLDBCH | 33441 | Fort Lauderdale | Active |
| FL | | | | FL | 779300 | 104900 | DAYTONA BEACH MAIN | 456 Rifle Shot | LD | LD | FALSE | TRUE | Virtual | DAYTONABCH | 32114 | Daytona Beach | Active |
| FL | | | | FL | 826700 | 56400 | FT LAUDERDALE CYPRES | 460 FB | LNS | LNS | TRUE | TRUE | Physical | FTLAUDERDL | 33334 | Fort Lauderdale | Active |
| FL | | | | FL | 826700 | 56400 | FT LAUDERDALE CYPRES | 460 FB | LNS | LNS | FALSE | TRUE | Physical | FTLAUDERDL | 33334 | Fort Lauderdale | Active |
| FL | | | | FL | 826700 | 56400 | FT LAUDERDALE CYPRES | 460 FB | LNS | LNS | TRUE | TRUE | Virtual | FTLAUDERDL | 33334 | Fort Lauderdale | Active |
| FL | | | | FL | 829600 | 58100 | FTLD JACARANDA | 460 FB | LNS | LNS | TRUE | TRUE | Physical | FTLAUDERDL | 33324 | Fort Lauderdale | Active |
| FL | | | | FL | 828100 | 55800 | FORT LAUDERDALE MAIN | 460 FB | LNS | LNS | TRUE | TRUE | Physical | FTLAUDERDL | 33301 | Fort Lauderdale | Active |
| FL | | | | FL | 828100 | 55800 | FORT LAUDERDALE MAIN | 460 FB | LNS | LNS | TRUE | TRUE | Virtual | FTLAUDERDL | 33301 | Fort Lauderdale | Active |
| FL | | | | FL | 828000 | 57300 | OAKLAND | 460 FB | LNS | LNS | TRUE | TRUE | Physical | FTLAUDERDL | 33313 | Fort Lauderdale | Active |
| FL | | | | FL | 828800 | 56800 | PLANTATION | 460 FB | LNS | LNS | FALSE | TRUE | Physical | FTLAUDERDL | 33317 | Fort Lauderdale | Active |
| FL | | | | FL | 828800 | 56800 | PLANTATION | 460 FB | LNS | LNS | TRUE | TRUE | Virtual | FTLAUDERDL | 33317 | Fort Lauderdale | active |
| FL | | | | FL | 784000 | 131000 | GAINESVILLE MAIN | 454 Rifle Shot | LD | LD | FALSE | TRUE | Virtual | GAINESVL | 32601 | Gainesville | Active |
| FL | | | | FL | 830100 | 54600 | HOLLYWOOD MAIN | 460 FB | LNS | LNS | TRUE | TRUE | Physical | FTLAUDERDL | 33020 | Fort Lauderdale | Active |
| FL | | | | FL | 830100 | 54600 | HOLLYWOOD MAIN | 460 FB | LNS | LNS | FALSE | TRUE | Virtual | FTLAUDERDL | 33020 | Fort Lauderdale | Active |
| FL | | | | FL | 831600 | 56700 | PEMBROKE PINES | 460 NFB | LNS | LNS | TRUE | FALSE | Physical | FTLAUDERDL | 33025 | Fort Lauderdale | Active |
| FL | | | | FL | 831000 | 55700 | WEST HOLLYWOOD | 460 NFB | LNS | LNS | TRUE | FALSE | Physical | HOLLYWOOD | 33023 | Fort Lauderdale | Active |
| FL | | | | FL | 764800 | 127600 | JACKSONVILLE-CLAY ST | 452 FB | LNS | MediaOne | TRUE | TRUE | Physical | JACKSONVL | 32202 | Jacksonville | Active |
| FL | | | | FL | 764800 | 127600 | JACKSONVILLE-CLAY ST | 452 FB | LNS | MediaOne | FALSE | TRUE | Virtual | JACKSONVL | 32202 | Jacksonville | Active |
| FL | | | | FL | 765800 | 126200 | SAN JOSE | 452 NFB | LNS | LNS | TRUE | FALSE | Physical | JACKSONVL | 32217 | Jacksonville | Active |
| FL | | | | FL | 765200 | 127200 | JACKSONVILLE | 452 FB | LNS | LNS | FALSE | TRUE | Physical | JACKSONVL | 32207 | Jacksonville | Active |
| FL | | | | FL | 765200 | 127200 | JACKSONVILLE | 452 FB | LNS | MediaOne | FALSE | TRUE | Physical | JACKSONVL | 32207 | Jacksonville | Active |
| FL | | | | FL | 836200 | 53600 | ALHAMBRA | 460 FB | LNS | LNS | TRUE | TRUE | Physical | MIAMI | 33134 | Miami | Active |
| FL | | | | FL | 836200 | 53600 | ALHAMBRA | 460 FB | LNS | LNS | TRUE | TRUE | Virtual | MIAMI | 33134 | Miami | Active |
| FL | | | | FL | 835400 | 54600 | MIAMI AIRPORT | 460 NFB | LNS | LNS | TRUE | FALSE | Physical | MIAMI | 33166 | Miami | Active |
| FL | | | | FL | 837400 | 55200 | CANAL | 460 NFB | LNS | LNS | TRUE | FALSE | Physical | MIAMI | 33165 | Miami | Active |
| FL | | | | FL | 835100 | 52800 | GRANDE | 460 FB | LNS | LNS | TRUE | TRUE | Physical | MIAMI | 33128 | Miami | Active |
| FL | | | | FL | 835100 | 52800 | GRANDE | 460 FB | LNS | LNS | TRUE | TRUE | Virtual | MIAMI | 33128 | Miami | Active |
| FL | | | | FL | 834300 | 55900 | HIALEAH | 460 FB | LNS | LNS | TRUE | TRUE | Physical | MIAMI | 33012 | Miami | Active |
| FL | | | | FL | 835200 | 54800 | POINCIANA | 460 FB | LNS | LNS | TRUE | TRUE | Physical | MIAMI | 33166 | Miami | Active |
| FL | | | | FL | 836100 | 55700 | PALMETTO | 460 FB | LNS | LNS | TRUE | TRUE | Physical | MIAMI | 33172 | Miami | Active |
| FL | | | | FL | 837200 | 53700 | red road | 460 NFB | LNS | LNS | TRUE | FALSE | Physical | MIAMI | 33143 | Miami | Active |
| FL | | | | FL | 836400 | 54500 | MIAMI WEST | 460 NFB | LNS | LNS | TRUE | FALSE | Physical | MIAMI | 33144 | Miami | Active |
| FL | | | | FL | 831300 | 54000 | NDAD-OLETA | NFB | NorthPoint | NorthPoint | FALSE | FALSE | Physical | NORTH DADE | 33180 | Miami | Active |
| FL | | | | FL | 790800 | 122700 | Ocala | 454 Rifle Shot | LD | LD | FALSE | TRUE | Physical | OCALA | 34471 | Ocala | Active |
| FL | | | | FL | 794600 | 101600 | AZALEA PARK | 458 NFB | LNS | LNS | TRUE | FALSE | Physical | ORLANDO | 32822 | Orlando | Active |
| FL | | | | FL | 795400 | 103200 | ORLD-MAGNOLIA | 458 FB | LNS | LNS | FALSE | TRUE | Physical | ORLANDO | 32801 | Orlando | Active |
| FL | | | | FL | 795400 | 103200 | ORLD-MAGNOLIA | 458 FB | LNS | LNS | TRUE | TRUE | Physical | ORLANDO | Orlando | Orlando | |
| FL | | | | FL | 796800 | 102200 | ORLD-PINECASTLE | 458 FB | LNS | LNS | TRUE | TRUE | Physical | ORLANDO | 32809 | Orlando | Active |
| FL | | | | FL | 795500 | 104800 | PINE HILLS | 458 NFB | LNS | LNS | TRUE | FALSE | Physical | ORLANDO | 32808 | Orlando | Active |
| FL | | | | FL | 796900 | 101800 | SAND LAKE | 458 FB | LNS | LNS | TRUE | TRUE | Physical | ORLANDO | 32809 | Orlando | Active |

| | | | | | | | | | | | |
|----|--------|--------|----------------------|----------------|------------|-------|-------|----------|-------------|---------------------------------------|--------|
| FL | 825400 | 56500 | FEDERAL | 460 FB | LNS | TRUE | TRUE | Physical | POMPANOBOCH | 33060 Fort Lauderdale | Active |
| FL | 826400 | 58000 | MAGATE | 460 FB | LNS | TRUE | TRUE | Physical | POMPANOBOCH | 33063 Fort Lauderdale | Active |
| FL | 820600 | 118900 | Pinellas | 952 NFB | LNS | FALSE | FALSE | Physical | CLEARWATER | 33764 Tampa-St. Petersburg-Clearwater | |
| FL | 814700 | 220000 | Belmont | 448 Rifle Shot | LD | FALSE | FALSE | Virtual | FERNINDNBCH | 32501 Pensacola | Active |
| FL | 789500 | 104400 | SANFORD MAIN | 458 NFB | LNS | TRUE | FALSE | Physical | SANFORD | 32771 Orlando | Active |
| FL | 822500 | 115900 | ST. PETERSBURG | 952 NFB | LNS | TRUE | FALSE | Physical | STPETERSBG | 33701 Tampa-St. Petersburg-Clearwater | Active |
| FL | 829600 | 109400 | SARASOTA MAIN | 952 Rifle Shot | LD | FALSE | FALSE | Virtual | SARASOTA | 34236 Sarasola-Bradenton | Active |
| FL | 817400 | 117000 | SWEETWATER | 952 FB | LNS | TRUE | TRUE | Physical | TAMPA | 33615 Tampa-St. Petersburg-Clearwater | Active |
| FL | 817400 | 117000 | SWEETWATER | 952 NFB | NorthPoint | FALSE | FALSE | Physical | TAMPA | 33615 Tampa-St. Petersburg-Clearwater | Active |
| FL | 817200 | 114700 | | 952 FB | LNS | FALSE | FALSE | Virtual | TAMPA | 33602 Tampa-St. Petersburg-Clearwater | Active |
| FL | 816000 | 113500 | TAMPA-MAIN | 952 FB | NorthPoint | FALSE | FALSE | Physical | TAMPA | 33602 Tampa-St. Petersburg-Clearwater | Active |
| FL | 817200 | 114700 | Tampa EAX | 952 FB | LNS | TRUE | TRUE | Virtual | TAMPA | 33602 Tampa-St. Petersburg-Clearwater | Active |
| FL | 794200 | 103400 | WINTER PARK | 458 FB | LNS | TRUE | TRUE | Physical | WINTERPARK | 32789 Orlando | Active |
| FL | 816200 | 60800 | MAIN ANNEX | 460 FB | LNS | TRUE | TRUE | Virtual | W PALM BCH | 33401 West Palm Beach-Boca Raton | Active |
| FL | 816200 | 60800 | MAIN ANNEX | 460 FB | LNS | TRUE | TRUE | Physical | W PALM BCH | 33401 West Palm Beach-Boca Raton | Active |
| FL | 817100 | 61800 | HAVERHILL | 460 FB | LNS | TRUE | TRUE | Physical | W PALM BCH | 33417 West Palm Beach-Boca Raton | Active |
| FL | 817100 | 61800 | HAVERHILL | 460 FB | LNS | TRUE | TRUE | Virtual | W PALM BCH | 33417 West Palm Beach-Boca Raton | Active |
| FL | 817500 | 115600 | WESTSIDE | 952 FB | LNS | TRUE | TRUE | Physical | TAMPA | 33607 Tampa-St. Petersburg-Clearwater | Active |
| GA | 708900 | 167400 | AUGUSTA-MAIN AND TOL | 438 Rifle Shot | LD | FALSE | TRUE | Virtual | AUGUSTA | 30901 Augusta-Aiken | active |
| GA | 765000 | 181500 | ALBANY MAIN | 444 Rifle Shot | LD | FALSE | TRUE | Virtual | ALBANY | 31701 Albany | Active |
| GA | 718600 | 210300 | ALPHARETTA-MAIN | 438 FB | LNS | TRUE | TRUE | Physical | ALPHARETTA | 30004 Atlanta | Active |
| GA | 718600 | 210300 | ALPHARETTA-MAIN | 438 FB | MediaOne | FALSE | TRUE | Virtual | ALPHARETTA | 30004 Atlanta | Active |
| GA | 724300 | 209200 | BUCKHEAD | 438 FB | LNS | TRUE | TRUE | Virtual | ATLANTA | 30305 Atlanta | Active |
| GA | 724300 | 209200 | BUCKHEAD | 438 FB | MediaOne | FALSE | TRUE | Virtual | ATLANTA | 30305 Atlanta | Active |
| GA | 724300 | 209200 | BUCKHEAD | 438 NFB | NorthPoint | FALSE | FALSE | Physical | ATLANTA | 30305 Atlanta | Active |
| GA | 725900 | 208400 | COURTLAND STREET | 438 FB | MediaOne | FALSE | TRUE | Virtual | ATLANTA | 30303 Atlanta | Active |
| GA | 725900 | 208400 | COURTLAND STREET | 438 FB | LNS | TRUE | TRUE | Physical | ATLANTA | 30303 Atlanta | Active |
| GA | 725900 | 208400 | COURTLAND STREET | 438 NFB | NorthPoint | FALSE | FALSE | Physical | ATLANTA | 30303 Atlanta | Active |
| GA | 728000 | 208500 | EAST POINT | 438 FB | LNS | TRUE | TRUE | Physical | ATLANTA | 30344 Atlanta | Active |
| GA | 728000 | 208500 | EAST POINT | 438 FB | MediaOne | FALSE | TRUE | Virtual | ATLANTA | 30344 Atlanta | active |
| GA | 725500 | 208800 | PEACHTREE PLACE | 438 FB | MediaOne | FALSE | TRUE | Virtual | ATLANTA | 30313 Atlanta | Active |
| GA | 725500 | 208800 | PEACHTREE PLACE | 438 FB | LNS | TRUE | TRUE | Physical | ATLANTA | 30313 Atlanta | Active |
| GA | 723200 | 209900 | SANDY SPRINGS | 438 FB | MediaOne | FALSE | TRUE | Virtual | ATLANTA | 30342 Atlanta | Active |
| GA | 723200 | 209900 | SANDY SPRINGS | 438 NFB | LNS | FALSE | FALSE | Virtual | ATLANTA | 30342 Atlanta | Active |
| GA | 723200 | 209900 | SANDY SPRINGS | 438 NFB | NorthPoint | FALSE | FALSE | Physical | ATLANTA | 30342 Atlanta | Active |
| GA | 724100 | 208000 | TOCO HILLS | 438 FB | LNS | TRUE | TRUE | Physical | ATLANTA | 30329 Atlanta | Active |
| GA | 724100 | 208000 | TOCO HILLS | 438 FB | MediaOne | FALSE | TRUE | Virtual | ATLANTA | 30329 Atlanta | Active |
| GA | 725300 | 209500 | WOODLAND | 438 NFB | NorthPoint | FALSE | FALSE | Physical | ATLANTA | 30318 Atlanta | Active |
| GA | 722500 | 208400 | CHAMBLEE MAIN | 438 NFB | LNS | TRUE | FALSE | Physical | CHAMBLEE | 30341 Atlanta | Active |
| GA | 755700 | 204400 | Columbus Main & Toll | 438 Rifle Shot | LD | FALSE | TRUE | Virtual | COLUMBUS | 31901 Columbus | Active |
| GA | 724300 | 201800 | CONYERS-MAIN | 438 NFB | LNS | FALSE | FALSE | Physical | CONYERS | 30012 Atlanta | Active |
| GA | 719100 | 207200 | DULUTH | 438 NFB | LNS | TRUE | FALSE | Virtual | DULUTH | 30096 Atlanta | Active |
| GA | 721900 | 209600 | DUNWOODY | 438 FB | LNS | TRUE | TRUE | Physical | CHAMBLEE | 30338 Atlanta | Active |
| GA | 721900 | 209600 | DUNWOODY | 438 FB | MediaOne | FALSE | TRUE | Virtual | CHAMBLEE | 30338 Atlanta | Active |
| GA | 721100 | 206000 | | 438 FB | MediaOne | FALSE | TRUE | Virtual | TUCKER | 30047 Atlanta | Active |
| GA | 718600 | 204400 | LAWRENCVILLE MAIN | 438 NFB | LNS | TRUE | FALSE | Physical | LAWRENCEVL | 30045 Atlanta | Active |
| GA | 736400 | 186600 | MACON MAIN & TOLL | 446 Rifle Shot | LD | FALSE | TRUE | Virtual | MACON | 31201 Macon | Active |
| GA | 723700 | 213100 | MARIETTA MAIN | 438 FB | LNS | TRUE | TRUE | Physical | MARIETTA | 30060 Atlanta | Active |
| GA | 723700 | 213100 | MARIETTA MAIN | 438 FB | LNS | FALSE | TRUE | Physical | MARIETTA | 30060 Atlanta | Active |
| GA | 723700 | 213100 | MARIETTA MAIN | 438 FB | MediaOne | FALSE | TRUE | Virtual | MARIETTA | 30060 Atlanta | active |
| GA | 720900 | 207600 | norcross | 438 FB | LNS | TRUE | TRUE | Physical | NORCROSS | 30071 Atlanta | Active |
| GA | 720900 | 207600 | norcross | 438 FB | MediaOne | FALSE | TRUE | Virtual | NORCROSS | 30071 Atlanta | Active |
| GA | 720900 | 207600 | norcross | 438 NFB | NorthPoint | FALSE | FALSE | Physical | NORCROSS | 30071 Atlanta | Active |
| GA | 720700 | 210900 | ROSWELL MAIN | 438 FB | MediaOne | FALSE | TRUE | Virtual | ROSWELL | 30075 Atlanta | Active |
| GA | 724600 | 211800 | SMYRNA | 438 FB | LNS | TRUE | TRUE | Physical | SMYRNA | 30080 Atlanta | Active |
| GA | 724600 | 211800 | SMYRNA | 438 FB | MediaOne | FALSE | TRUE | Virtual | SMYRNA | 30080 Atlanta | Active |
| GA | 723700 | 211300 | POWER FERRY | 438 FB | LNS | TRUE | TRUE | Virtual | SMYRNA | 30339 Atlanta | Active |
| GA | 723700 | 211300 | POWER FERRY | 438 FB | MediaOne | FALSE | TRUE | Virtual | SMYRNA | 30339 Atlanta | Active |
| GA | 723700 | 211300 | POWER FERRY | 438 NFB | NorthPoint | FALSE | FALSE | Physical | SMYRNA | 30339 Atlanta | Active |

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|----|--------|--------|----------------------|----------------|----------|-------|-------|----------|------------|---|--------|
| GA | 726900 | 137900 | SAVANNAH BULL STREET | Rifle Shot | LD | FALSE | TRUE | Physical | SAVANNAH | 31401 Savannah | active |
| GA | 722700 | 206900 | TUCKER MAIN | 438 FB | LNS | TRUE | TRUE | Virtual | TUCKER | 30084 Atlanta | Active |
| GA | 722700 | 206900 | TUCKER MAIN | 438 FB | MediaOne | FALSE | TRUE | Virtual | TUCKER | 30084 Atlanta | Active |
| KY | 652800 | 277300 | LOUISVILLE- ARMORY P | FB | BB-AF | FALSE | TRUE | TRUE | LOUISVILLE | 40203 Louisville | Active |
| KY | 652800 | 277300 | LOUISVILLE- ARMORY P | FB | BB-AF | FALSE | TRUE | TRUE | LOUISVILLE | 40203 Louisville | Active |
| KY | 646000 | 256200 | LEXINGTON | FB | BB-AF | FALSE | TRUE | TRUE | LEXINGTON | 40507 Lexington | Active |
| LA | 847600 | 287400 | BATON ROUGE MAIN | 492 Rifle Shot | LD | FALSE | TRUE | Virtual | BATONROUGE | 70802 Baton Rouge | active |
| LA | 858700 | 299700 | LAFAYETTE MAIN | 488 Rifle Shot | LD | FALSE | TRUE | Virtual | LAFAYETTE | 70501 Lafayette | active |
| LA | 848300 | 263800 | NEW ORLEANS MAIN | 490 Rifle Shot | LD | FALSE | TRUE | Virtual | NEWORLEANS | 70113 New Orleans | |
| MS | 803500 | 287900 | E CAP PEARL | 482 Rifle Shot | LD | FALSE | TRUE | Virtual | JACKSON | 39201 Jackson | active |
| MS | 753400 | 282500 | TUPELO MAIN | 482 Rifle Shot | LD | FALSE | TRUE | Virtual | TUPELO | 38804 Rural | Active |
| NC | 636400 | 158800 | BURLINGTON-DAVIS | 424 NFB | LNS | TRUE | FALSE | Physical | BURLINGTON | 27215 Greensboro--Winston-Salem--High P | active |
| NC | 635600 | 145600 | CARY CENTRAL | 426 NFB | LNS | TRUE | FALSE | Physical | CARY RTP | 27513 Raleigh-Durham-Chapel Hill | active |
| NC | 667000 | 169800 | CHARLOTTE-SOUTH BLVD | 422 FB | LNS | TRUE | TRUE | Physical | CHARLOTTE | 28217 Charlotte-Gastonia-Rock Hill | Active |
| NC | 665700 | 169800 | CHARLOTTE-CADWELL | 422 FB | LNS | TRUE | TRUE | Physical | CHARLOTTE | 28202 Charlotte-Gastonia-Rock Hill | Active |
| NC | 665200 | 168400 | CENTRAL | 422 NFB | LNS | TRUE | FALSE | Physical | CHARLOTTE | 28205 Charlotte-Gastonia-Rock Hill | active |
| NC | 664000 | 170000 | CHARLOTTE DERITA | 422 FB | LNS | TRUE | TRUE | Physical | CHARLOTTE | 28262 Charlotte-Gastonia-Rock Hill | active |
| NC | 667400 | 169000 | CHARLOTTE (REID) | 422 FB | LNS | TRUE | TRUE | Physical | CHARLOTTE | 28210 Charlotte-Gastonia-Rock Hill | Active |
| NC | 666400 | 168700 | SHARON AMITY | 422 FB | LNS | TRUE | TRUE | Physical | CHARLOTTE | 28211 Charlotte-Gastonia-Rock Hill | Active |
| NC | 665700 | 171000 | CHARLOTTE THOMASBORC | 422 NFB | LNS | TRUE | FALSE | Physical | CHARLOTTE | 28208 Charlotte-Gastonia-Rock Hill | Active |
| NC | 663300 | 169700 | CHAROLTT-UNIVERSITY | 422 FB | LNS | TRUE | TRUE | Physical | CHARLOTTE | 28262 Charlotte-Gastonia-Rock Hill | Active |
| NC | 635900 | 151100 | CHAPEL HILL-ROSEMARY | 426 NFB | LNS | TRUE | FALSE | Physical | CHAPELHILL | 27514 Raleigh-Durham-Chapel Hill | Active |
| NC | 634700 | 147700 | | 426 NFB | LNS | TRUE | FALSE | Physical | DURHAM | 27703 Raleigh-Durham-Chapel Hill | Active |
| NC | 633000 | 149800 | | 426 NFB | LNS | TRUE | FALSE | Physical | DURHAM | 27701 Raleigh-Durham-Chapel Hill | active |
| NC | 640800 | 164700 | GREENSBORO-ASHLAND | 424 FB | LNS | TRUE | TRUE | Physical | GREENSBORO | 27407 Greensboro--Winston-Salem--High P | Active |
| NC | 640200 | 163900 | EUGENE | 424 FB | LNS | TRUE | TRUE | Physical | GREENSBORO | 27401 Greensboro--Winston-Salem--High P | Active |
| NC | 668300 | 175400 | Gastonia South Stree | 424 NFB | LNS | TRUE | FALSE | Physical | MILL CREEK | 28052 Charlotte-Gastonia-Rock Hill | Active |
| NC | 661000 | 183200 | Hickory | 422 Rifle Shot | LD | FALSE | TRUE | Physical | HICKORY | 28601 Hickory-Morganton-Lenoir | Active |
| NC | 623200 | 132900 | Rocky Mountain | 951 Rifle Shot | LD | FALSE | TRUE | Physical | ROCKYMOUNT | 27804 Rocky Mount | Active |
| NC | 633800 | 144300 | RALEIGH-GLENWOOD | 426 FB | LNS | TRUE | TRUE | Physical | RALEIGH | 27609 Raleigh-Durham-Chapel Hill | Active |
| NC | 633000 | 143500 | NEW HOPE | 426 FB | LNS | TRUE | TRUE | Physical | RALEIGH | 27604 Raleigh-Durham-Chapel Hill | Active |
| NC | 634400 | 143300 | RALEIGH-MORGAN | 426 FB | LNS | TRUE | TRUE | Physical | RALEIGH | 27601 Raleigh-Durham-Chapel Hill | Active |
| NC | 644000 | 171100 | WINSTON SALEM-FIFTH | 426 FB | LNS | TRUE | TRUE | Virtual | WINSTN SAL | 27101 Greensboro--Winston-Salem--High P | Active |
| NC | 645100 | 171900 | WINSTON-VINEYARD | 426 NFB | LNS | TRUE | FALSE | Physical | WINSTN SAL | 27104 Greensboro--Winston-Salem--High P | Active |
| SC | 702200 | 127900 | CHARLESTON DIAL & TO | 436 Rifle Shot | LD | FALSE | TRUE | Virtual | CHARLESTON | 29401 Charleston-North Charleston | Active |
| SC | 687200 | 189400 | GREENVILLE-DIAL & TO | 430 Rifle Shot | LD | FALSE | TRUE | Physical | GREENVILLE | 29601 Greenville-Spartanburg-Anderson | Active |
| TN | 709100 | 234600 | CHATTANOOGA-BRAINERD | 470 NFB | LNS | TRUE | FALSE | Physical | CHATTNOOGA | 37421 Chattanooga | Active |
| TN | 709600 | 235700 | DODDS | 472 FB | LNS | TRUE | TRUE | Physical | CHATTNOOGA | 37404 Chattanooga | Active |
| TN | 709700 | 236500 | NINETH STREET | 472 FB | LNS | TRUE | TRUE | Physical | CHATTNOOGA | 37403 Chattanooga | Active |
| TN | 681100 | 225600 | KNOXVILLE-BEARDEN | 474 NFB | LNS | TRUE | FALSE | Physical | KNOXVILLE | 37919 Knoxville | Active |
| TN | 680100 | 225100 | KNOXVILLE MAIN | 474 FB | LNS | TRUE | TRUE | Physical | KNOXVILLE | 37921 Knoxville | Active |
| TN | 682000 | 226400 | KNOXVILLE-WEST HILLS | 474 NFB | LNS | TRUE | FALSE | Physical | KNOXVILLE | 37919 Knoxville | Active |
| TN | 747100 | 312700 | Memphis Main | 468 Rifle Shot | LD | FALSE | TRUE | Physical | MEMPHIS | 38103 Memphis | Active |
| TN | 703700 | 270500 | NASHVILLE-BRENTWOOD | 470 NFB | LNS | TRUE | FALSE | Physical | NASHVILLE | 37027 Nashville | Active |
| TN | 702000 | 269600 | CRIEVE HALL | 470 NFB | LNS | TRUE | FALSE | Physical | NASHVILLE | 37211 Nashville | Active |
| TN | 700900 | 271100 | Main and Toll | 470 FB | LNS | TRUE | TRUE | Virtual | NASHVILLE | 37201 Nashville | |
| TN | 700900 | 271100 | Main and Toll | 470 FB | LNS | FALSE | TRUE | Physical | NASHVILLE | 37201 Nashville | Active |
| TN | 701900 | 271400 | SHARONDALE | 470 FB | LNS | TRUE | TRUE | Physical | NASHVILLE | 37212 Nashville | Active |
| TN | 701400 | 271400 | NASHVILLE-UNIVERSITY | 470 FB | LNS | TRUE | TRUE | Physical | NASHVILLE | 37203 Nashville | Active |

ATTACHMENT 15A

REDACTED

| AT&T's Local Switches | | | | | | | | |
|---------------------------|---------------------------|---------------------------|-------|-------------|-------------------------|-----------------------|---------------|--|
| Switch Name | Market | City | State | Switch Type | Manufacturer | Installed T1 Capacity | % Utilization | CLLJ |
| Birmingham | Birmingham | Birmingham | AL | DMS | Northern Telecom | 2121 | 46 | BRHMALMT BRHMALMT XJY BRHMALCH JMD BRHMALOX BMD BRHMALRC CMD |
| Jacksonville Jacksonville | Jacksonville Jacksonville | Jacksonville Jacksonville | FL FL | 5ESS DMS | Lucent Northern Telecom | 1107 2552 | 52 53 | JCVLFLOL JCVLFLOL XXX JCVFLFSM NMD JCVFLFSM 4MD JCVFLFSJ GMD |
| Miami-1 Miami-3 | Miami Miami | North Miami Ojus | FL FL | 5ESS DMS | Lucent Northern Telecom | 4529 1619 | 72 38 | MIAMFLAE 1MD MIAMFLAE WA1 MIAMFLGR VMD MIAMFLGR WA1 MIAMFHL 3MD MIAMFHL 3MD MIAMFLP8 3MD MIAMFLPL 3MD MIAMFLAP 2MD MIAMFLCA 3MD MIAMFLCA 3MD MIAMFLVM 3MD NOADELOL 3MD |
| Miami-2 | Miami | Fl. Lauderdale | FL | 5ESS | Lucent | 3278 | 36 | BCRTFLBT WA1 BCRTFLBT RMD BCRTFLMA 3MD FLDFLCY 6MD FLDFLCY PMD FLDFLCY WA1 FLDFLJA 6MD FLDFLMR 3MD FLDFLMR WA1 FLDFOA 3MD FLDDEPL WA1 FLDDEPL WA1 HLWDFLMA 65M HLWDFLMA WA1 PMBHFLFE 3MD PMBHFLMA 6MD WPBFHLAN WA7 WPBFHLAN XCX WPBFHLLH 3MD WPBFHLLH WA1 |
| Pompano Beach | Miami (Pompano Beach) | Pompano | FL | 5ESS | Lucent | 2065 | 65 | Customer--no LNS fiber into South Florida) HLWDFLWH 4MD |
| Orlando | Orlando | Orlando | FL | 5ESS | Lucent | 3544 | 43 | ASLPFLXA H19 ORLDFELMA WAL ORLDFELMA XTY ORLDLPC 7MD ORLDFLSA 4MD WNPKFLXA I29 ORLDFLAP CMD ORLDFLPH HMD SNRFLMA 4MD |
| Tampa | Tampa | Tampa | FL | 5ESS | Lucent | 3677 | 52 | BHPKFLXA W08 CLWRFLXA W12 SWTHFLXA W03 WAMPFLXA W21 WAMPFLXA W10 TAMPFLXX W04 WSSDFLXA W12 PNLSFLXA W07 SPBGFSLXA W10 |

[illegible]

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|-------------|-------------|-------------|----|-----|------------------|------|----|--|--|--|--|--|----|--|--|--|
| Chattanooga | Chattanooga | Chattanooga | TN | DMS | Northern Telecom | 2204 | 29 | CHTGTNDT CHGTNNS CHGTNBR | AMD WA3 AMD | | | | TN | 709600 709700 709100 | 235700 236500 234600 | On-Net On-Net Off-net |
| Knoxville | Knoxville | Knoxville | TN | DMS | Northern Telecom | 2447 | 22 | KNVLTNMA KNVLTNBE KNVLTNWH | W9A BMD EMD | | | | TN | 680100 681100 682000 | 225100 225600 226400 | On-Net Off-net Off-net |
| Nashville | Nashville | Nashville | TN | DMS | Northern Telecom | 1825 | 59 | NSVLTNMT NSVLTNMT NSVLTNST NSVLTNUN NSVLTNBW NSVLTNCH | XDX XCY EMD CWD JMD MWD | | | | TN | 700900 700900 701900 701400 703700 702000 | 271100 271100 271400 271400 270500 269600 | On-Net On-Net On-Net On-Net Off-net Off-net |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |

*OC-48 counts reported at building level. At least one OC-48 is installed in each on-net cage.